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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MONTANA**

-----X
MONTANA DEPARTMENT OF
ENVIRONMENTAL QUALITY,

Plaintiff,

v.

VOLKSWAGEN AKTIENGESELLSCHAFT
d/b/a VOLKSWAGEN GROUP and/ or
VOLKSWAGEN AG; AUDI AG;
VOLKSWAGEN GROUP OF AMERICA,
INC., VOLKSWAGEN GROUP AMERICA
CHATTANOOGA OPERATIONS, LLC,
AUDI OF AMERICA, LLC; DR. ING. H.C. F.
PORSCHE AG d/b/a/ PORSCHE AG; and
PORSCHE CARS NORTH AMERICA, INC.,

Defendants.
-----X

Case No. 6:17-cv-00003-CCL

RULE 7.1 STATEMENT

Pursuant to Federal Rule of Civil Procedure 7.1, the undersigned counsel for Volkswagen Aktiengesellschaft d/b/a Volkswagen Group and/ or Volkswagen AG (“VWAG”); Audi AG (“Audi AG”); Volkswagen Group of America, Inc. (“VWGoA”); Volkswagen Group America Chattanooga Operations, LLC (“VW Chattanooga”); Audi Of America, LLC (“AoA”), certifies as follows: (i) Volkswagen AG is the parent corporation of Volkswagen Group of America, Inc. and Audi AG; (ii) Volkswagen AG is a publicly-held German corporation that owns 10% or more of the stock of Volkswagen Group of America, Inc. and Audi AG; and (iii) Porsche Automobil Holding SE is a publicly-held corporation that owns more than 10% or more of Volkswagen AG’s stock.

Respectfully submitted,

/s/ Stephen D. Bell

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Audi AG, and Audi of America, LLC*

* Application for admission *pro hac vice*
forthcoming

January 13, 2017

CERTIFICATE OF SERVICE

I hereby certify that on the 13th day of January, 2017, the foregoing **RULE 7.1 STATEMENT**, was served on the following counsel for Plaintiff by email and U.S. mail:

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